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September 25, 2023

VIA ECF

Hon. Joan M. Azrack
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Central American Refugee Ctr., M.C., and V.A. v. Nassau County, et. al.*
Docket No. 23-CV-05412 (JMA) (ARL)

Dear Judge Azrack:

Plaintiffs and Defendants in the above-captioned matter submit this letter jointly, following Defendants' Letter Motion for Pre-Motion Conference dated September 18, 2023 (ECF No. 28) and pursuant to Section IV.B of Your Honor's Individual Rules. The parties have conferred and believe that a pre-motion conference is not necessary at this time. Plaintiffs plan to amend their complaint and the parties have agreed on the schedule below. The parties jointly request that the Court order the following schedule for (i) Plaintiffs' amendment of the Complaint and (ii) the Defendants' anticipated motion to dismiss:

- Plaintiffs' amended complaint will be due by Friday, October 27, 2023.
- Defendants' motion to dismiss or other responsive pleading will be due by Friday, November 17, 2023.
- Plaintiffs' opposition, if any, to Defendants' motion to dismiss will be due by Friday, December 8, 2023.
- Defendants' reply in further support of their motion to dismiss will be due by Friday, December 22, 2023.

Respectfully,

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/s/ May K. Chiang

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